



February 19, 2018

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: CG Docket No. 03-123, *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, and CG Docket No. 13-24, *Misuse of Internet Protocol (IP) Captioned Telephone Service*

Dear Ms. Dortch:

The undersigned, with Roger Fleming of Northfork Strategies and Carl Billek, Senior Regulatory Counsel to IDT Telecom, Inc. ("IDT"), met on behalf of IDT with Commissioner Michael O'Rielly and his Wireline Legal Advisor Arielle Roth on Thursday, February 14.

We discussed the pleadings filed in the dockets captioned above and, in particular, the authority granted to the Commission under Section 225(b)(2) of the Communications Act ("the Act") with respect to intrastate telecommunications relay services for purposes of administering and enforcing Section 225. We observed that no jurisdictional separation of carrier property or expenses is required for the Commission to include intrastate revenues in the revenue base it uses to calculate the TRS contribution factor and thus such an expansion would require no Commission action under Sec. 410 of the Act.

We supported adoption of the approach to expanding the TRS fund revenue base described in paragraph 106 of the Further Notice of Proposed Rulemaking ("FNPRM")¹ in the instant docket as an interim measure should the Commission decide

¹ *Misuse of Internet Protocol (IP) Captioned Telephone Service; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 13-24, 03-123, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC No. 18-79 (rel. June 8, 2018).



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to refer to a Federal-State Joint Board the issues raised by the TRS contribution option described in paragraph 107 of the FNPRM. We also supported Commission adoption of the paragraph 106 proposal via a stand-alone order in the instant docket which addresses only that proposal. Finally, we reviewed the necessary steps for implementing a change in Commission rules for calculating the TRS factor and the associated time line for completing those actions in time for the calculation of the 2020 TRS factor. We observed that such a change requires Commission adoption in this docket of the paragraph 106 proposal no later than October or November of this year.

Sincerely,

A handwritten signature in black ink that reads "Colleen Boothby".

Colleen Boothby
Counsel, IDT Telecom, Inc.

cc: Commissioner Michael O'Rielly
Arielle Roth